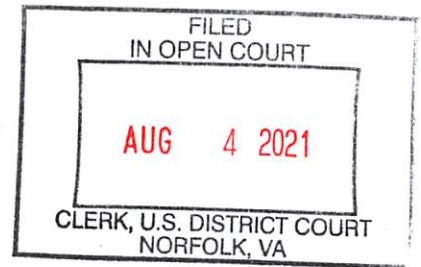


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

CHARLES WILLOUGHBY III,

Defendant.

) UNDER SEAL

)

) CRIMINAL NO. 2:21cr 96

)

) 18 U.S.C. § 2423(b)

) Travel with Intent to

) Engage in Illicit Sexual Conduct

) (Count 1)

)

) 18 U.S.C. § 2423(a)

) Transportation of a Minor with Intent to

) Engage in a Criminal Sexual Activity

) (Count 2)

)

) 18 U.S.C. § 2421(a)

) Transportation with Intent to

) Engage in a Criminal Sexual Activity

) (Count 3)

)

) 18 U.S.C. § 2428

) Forfeiture

INDICTMENT

August 2021 Term -- At Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 26, 2012, within the Eastern District of Virginia, and elsewhere, defendant CHARLES WILLOUGHBY III did travel in interstate commerce with a motivating purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, namely Jane Doe 1.

(In violation of Title 18, United States Code, Section 2423(b).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2012, within the Eastern District of Virginia, and elsewhere, defendant CHARLES WILLOUGHBY III did knowingly transport an individual, namely Jane Doe 1, who had not attained the age of 18 years, in interstate commerce, with intent that the individual engage in sexual activity for which a person can be charged with a criminal offense, namely Virginia Code § 18.2-370.1(A).

(In violation of Title 18, United States Code, Sections 2423(a) and 2.)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2012, within the eastern District of Virginia, and elsewhere, defendant CHARLES WILLOUGHBY III knowingly transported and caused to be transported Jane Doe 1, a 15-year-old girl, in interstate commerce with the intent to engage in sexual activity for which any person can be charged with a criminal offense, namely Virginia Code § 18.2-370.1(A).

(In violation of Title 18, United States Code, Sections 2421(a) and 2.)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

A. Defendant CHARLES WILLOUGHBY III, upon conviction of any of the offenses set forth in this Indictment, as part of the sentencing of the defendant pursuant to Fed.

R. Crim. P. 32.2, shall forfeit to the United States:

1. Any property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the offense;

2. Any property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

B. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(All pursuant to Title 18, United States Code, Sections 2428(a); Title 21, United States Code, Section 853(p).)

United States v. CHARLES WILLOUGHBY III
2:21CR 96

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

RAJ PAREKH
ACTING UNITED STATES ATTORNEY

By:



Elizabeth M. Yusi

Va. Bar No. 91982

Megan M. Montoya

Assistant United States Attorneys

Attorneys for the United States

United States Attorney's Office

101 West Main Street, Suite 8000

Norfolk, VA 23510

Office Number: (757) 441-6331

Fax Number: (757) 441-6689

E-Mail Address: Elizabeth.Yusi@usdoj.gov

E-Mail Address: Megan.Montoya@usdoj.gov